



May 23, 2007

Electronic Submission

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: *Ex Parte*, WT Docket Nos. 06-150, 06-169 & 96-86, PS Docket No.
06-229**

Dear Ms. Dortch:

Skype Communications S.A.R.L. ("Skype") hereby submits this *ex parte* filing in the above-captioned proceeding. The instant proceeding affords the Commission the opportunity to promote the efficient use of spectrum for wireless broadband services that are particularly well-suited for innovative applications, devices, and services that will benefit consumers across the United States. Specifically, Skype supports proposals made by Google Inc. ("Google")¹ and Frontline Wireless, LLC (Frontline")² that would promote consumer-friendly broadband wireless services.

Skype supports Google's request that the Commission promote wireless broadband platforms in the 722-728 MHz block. Dynamic auction techniques, including real-time auctions and per-device registration fees, can work to unlock the full value of the 700 MHz block. Google's proposals are aimed at moving spectrum to its highest-value use. As Google correctly notes, its proposals will

¹ See Letter from Richard S. Whitt, Esq., Washington Telecom and Media Counsel, Google Inc. to Marlene H. Dortch, *Ex Parte* Filing in WT Docket No. 06-150 (May 21, 2007) ("Google Letter").

² *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands*, WT Docket No. 06-150, Report and Order and Further Notice of Proposed Rulemaking, Section IV.B.5 (rel. Apr. 27, 2007).

help consumers by “reduc[ing] retail prices, engender[ing] a host of new service offerings, and spread[ing] broadband Internet access to the farthest reaches of the country.”³

Skype further believes that Google’s proposals are entirely consistent with Skype’s support for a consumer’s right to attach nonharmful devices and right to use applications of one’s choice.⁴ As Google notes from its own experience, “market mechanisms, in concert with open communications platforms, bring[] maximum benefits to both providers and users.”⁵

Accordingly, Skype also supports Frontline’s proposal to maximize equipment choice by allocating spectrum for an IP-based, open access architecture that enables use by any nonharmful equipment.⁶ As Skype has explained elsewhere,⁷ allowing users to attach any nonharmful device to the network will promote innovation and price competition in the markets for wireless devices and applications.

The proposals of Google and Frontline, along with those made in this proceeding by the Coalition for 4G in America, will enable new technologies and services and promote new nationwide entry in the wireless broadband market. Nationwide entry works to lower the cost of wireless handsets and other devices used with wireless broadband networks.

Please do not hesitate to address any questions to the undersigned.

³ Google Letter at 3.

⁴ See *Skype Communications S.A.R.L. Petition to Confirm a Consumer’s Right to Use Internet Communications Software and Attach Devices to Wireless Networks*, RM-11361 (filed Feb. 20, 2007) (“Skype Petition”).

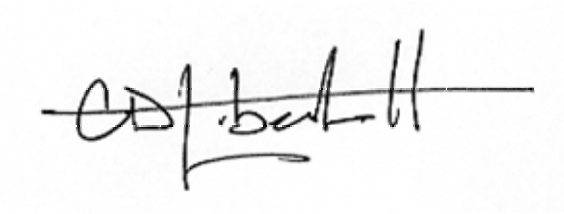
⁵ Google Letter at 2.

⁶ Comments of Frontline Wireless, LLC, PS Docket No. 06-229, at 29-31 (Feb. 26, 2007).

⁷ See Skype Petition at 5-6.

Respectfully submitted,

SKYPE COMMUNICATIONS S.A.R.L.

A handwritten signature in black ink, appearing to read "CD Libertelli", with a long horizontal line extending to the right.

Christopher D. Libertelli
Senior Director, Government and
Regulatory Affairs | N.A.
Skype Communications S.A.R.L.
15, Rue Notre Dame
L-2240 Luxembourg
Luxembourg